

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GREAT AMERICAN ALLICANCE)	
INSURANCE COMPANY, et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
RISO, INC.)	
)	
Defendant.)	Consolidated 04-12260-GAO
)	Civil Action Nos. 04-12397-GAO
RISO, INC.,)	
)	
Plaintiff.)	
)	
v.)	Honorable Judge George A. O'Toole, Jr.
)	
GREAT AMERICAN INSURANCE)	
COMPANY, et al.,)	
)	
Defendants.)	

AFFIDAVIT OF RICHARD H. NICOLAIDES, JR.

Richard H. Nicolaides, Jr., being duly sworn, deposes and says as follows:

1. I am a partner of the law firm Bates & Carey LLP, which represents Great American Alliance Insurance Company f/k/a American Alliance Insurance Company, Great American Assurance Company f/k/a Agricultural Insurance Company, Great American Insurance Company, and Great American Insurance Company of New York f/k/a American National Fire Insurance Company (collectively "Great American") in this action.

2. Attached hereto are Tabs A through Q, which are true and accurate copies of the following documents, or excerpts thereof, that are referenced in Great American's

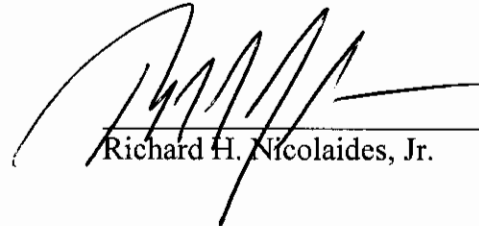
Memorandum of Law in Support of its Motion for Summary Judgment (“Memorandum of Law”). These Exhibits are attached hereto in the order in which they first appear in Great American’s Memorandum of Law, as follows:

- Tab A. American National Fire Insurance Company Policy No. MAC 800-69-20-01 (8/1/94 – 8/1/95).
- Tab B. Great American Insurance Company Policy No. MAC 800-69-20-02 (8/1/95 – 8/1/96).
- Tab C. American National Fire Insurance Company Policy No. PAC 124-18-64-00 (8/1/96 – 8/1/97).
- Tab D. American National Fire Insurance Company Policy No. PAC 124-18-64-01 (8/1/97 – 8/1/98).
- Tab E. American National Fire Insurance Company Policy No. PAC 377-22-25-00 (8/1/98 – 9/1/99).
- Tab F. American National Fire Insurance Company Policy No. PAC 377-22-25-02 (9/1/99 – 9/1/00).
- Tab G. American National Fire Insurance Company Policy No. UMB 800-69-23-00 (8/1/94 – 8/1/95).
- Tab H. Agricultural Insurance Company Policy No. UMB 800-69-23-01 (8/1/95 – 8/1/96).
- Tab I. Agricultural Insurance Company Policy No. UMB 124-18-67-00 (8/1/96 – 8/1/97).
- Tab J. Agricultural Insurance Company Policy No. UMB 124-18-67-01 (8/1/97 – 8/1/98).
- Tab K. American Alliance Insurance Company Policy No. UMB 377-22-28-02 (8/1/98 – 9/1/99).
- Tab L. American Alliance Insurance Company Policy No. UMB 377-22-28-04 (9/1/99 – 10/1/00).
- Tab M. RISO, Inc.’s Complaint.
- Tab N. The Modesto Complaint in the lawsuit captioned *Modesto City Schools, et al. v. Riso Kagaku Corp., et al.*, Case No. CIV. S-

99-2214, filed in the United States District Court for the Eastern District of California.

- Tab O. RISO, Inc.'s Responses to Great American's First Set of Requests to Admit.
- Tab P. The Western Duplicating Complaint in the lawsuit captioned *Western Duplicating, Inc. v. RISO, Inc., et al.*, Case No. CIV S-98-0208, filed in the United States District Court for the Eastern District of California.
- Tab Q. Non-published cases cited in Great American's Memorandum of Law.

Signed under the penalties of perjury this 16th day of August, 2005.



Richard H. Nicolaides, Jr.

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